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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)
	)
Application of SBC Communications Inc.,	)
Southwestern Bell Telephone Company,	) CC Docket No. 00-65
And Southwestern Bell Communications	)
Services, Inc. d/b/a Southwestern Bell Long	)
Distance for Provision of In-Region	)
InterLATA Services in Texas	)

EXHIBITS TO THE SUPPLEMENTAL COMMENTS OF AT&T CORP.
IN OPPOSITION TO SBC's SECTION 271 APPLICATION FOR TEXAS

VOLUME 2

Filed: April 26, 2000

APPENDIX TO SUPPLEMENTAL COMMENTS OF AT&T CORP. IN OPPOSITION TO SBC's SECTION 271 APPLICATION FOR TEXAS

CC Docket No. 00-65

EXH.	DECLARANT	SUBJECT(S) COVERED	RELEVANT STATUTORY PROVISIONS
A	Sarah DeYoung/Mark Van de Water	UNE Loop Provisioning–Hot Cuts	§ 271(c)(2)(B)(ii), (iv), (xi)
B	Julie S. Chambers/ Sarah DeYoung	Operations Support Systems	§ 271(c)(2)(B)(ii), (iv), (x)
C	C. Michael Pfau/ Julie S. Chambers	xDSL	§ 271(c)(2)(B)(ii), (iv); § 271(d)(3)(C)
D	A. Daniel Kelley/ Steven E. Turner	Public Interest—Scope and Nature of Local Competition	§ 271(d)(3)(C)
E	C. Michael Pfau	Performance Measurements	§ 271(c)(2)(B)(i), (ii); § 271(d)(3)(C)

MISCELLANEOUS APPENDIX

EXH.	DOCUMENT
F	SBC-ASI Agreement on Interim Line Sharing, available at www.sbc.com
G	Southwestern Bell Telephone Company's Brief on Phase I Issues, in Complaint of AT&T Communications of the Southwest, Inc., et al. Against Southwestern Bell Tel. Co. To Eliminate Non-Recurring Charges, Docket Nos. 21622, 22290 (Texas PUC filed Apr. 5, 2000)

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SUPPLEMENTAL DECLARATION OF

JULIE S. CHAMBERS AND SARAH DeYOUNG

ON BEHALF OF

AT&T CORP.

April 26, 2000

TABLE OF CONTENTS

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	)	
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SUPPLEMENTAL DECLARATION OF
JULIE S. CHAMBERS AND SARAH DeYOUNG
ON BEHALF OF AT&T CORP.

1. My name is Julie S. Chambers. I am the same Julie S. Chambers who submitted a Declaration on January 31, 2000, with C. Michael Pfau in CC Docket No. 00-4. I am responsible for managing the relationship with the SWBT Account Team to resolve all operational and policy issues involving AT&T's UNE-P service in Texas. My background and qualifications are more fully set forth in my January 31, 2000 Declaration.

2. My name is Sarah DeYoung. I am the same Sarah DeYoung who submitted a Declaration on January 31, 2000, and a Reply Declaration on February 22, 2000, with Nancy Dalton in the previous Commission proceedings involving SBC's application for authority under Section 271 of the Telecommunications Act of 1996 (CC Docket No. 00-4). I have responsibility for AT&T's business relationship with SBC Communications to support AT&T's plans for local service market entry and for negotiations with SWBT, Pacific Bell, and

Southern New England Telephone to facilitate such market entry. My background and

qualifications are more fully set forth in my January 31, 2000 Declaration.

I.   PURPOSE AND SUMMARY OF DECLARATION

3.   The purpose of this Supplemental Declaration is to respond to the

contentions of SBC and Southwestern Bell Telephone Company ("SWBT") in its April 5, 2000

filing and the Supplemental Affidavit of Elizabeth A. Ham ("Ham Supp. Aff.") that the

operations support systems ("OSS") of SWBT meet the OSS requirements of the Section 271

competitive checklist. *See* Ham Supp. Aff., ¶ 70.

4.   As SWBT states in the April 5, 2000 letter accompanying its affidavits,

"Nothing speaks more eloquently than the facts."[1] In lieu of presenting facts, however, SWBT's

latest submission on OSS is based largely on: (1) promises (many of them made for the first

time only a few days before SWBT's filing) to comply with its OSS obligations in the future;

and (2) SWBT's ability to circumvent the regular notice requirements of the change management

process ("CMP") that it agreed to follow in Texas. SWBT's latest submission in no way alters

the fact, already demonstrated in the record of this proceeding, that SWBT is not in compliance

with its OSS obligations.[2] Among other things, SWBT continues to reject over 30 percent of all

CLEC orders, an unacceptable performance that is compounded by excessive delays due to the

fact that more than one-third of SWBT's rejection notices continue to be manually typed; CLECs

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[1] *See* letter from SWBT to Magalie Roman Salas, dated April 5, 2000 ("SWBT Letter Br."), at 5.

[2] *See* Declaration of Nancy Dalton and Sarah DeYoung, filed January 31, 2000
("Dalton/DeYoung Initial Decl."); Reply Declaration of Nancy Dalton and Sarah DeYoung, filed
February 22, 2000 ("Dalton/DeYoung Reply Decl.").

FCC DOCKET CC NO. 00-65
SUPPLEMENTAL DECLARATION
OF JULIE S. CHAMBERS
and SARAH DeYOUNG

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continue to experience service outages and service degradation on simple UNE platform conversions, the resolution of which too frequently involves engineering work that would not be expected on a remote switch record change; SWBT's provisioning accuracy has deteriorated sharply, with SWBT reporting provisioning errors on nearly 10 percent of CLEC orders, and 15 percent of AT&T's UNE-P orders; and CLECs are still unable to integrate SWBT's DataGate pre-ordering interface with its EDI ordering interface. In light of these and many other continuing deficiencies in its OSS described below, SWBT still does not provide CLECs with nondiscriminatory access to its OSS.

5.   First, as discussed in Part II of this Declaration, SWBT continues to fail to provide CLECs with the assistance that they need to use its interfaces and send orders over them as efficiently as possible. By SWBT's own admission, *none* of the releases that it has implemented during 2000 have complied with the regular notice requirements of the CMP. Instead, SWBT has circumvented the notice requirements by invoking the Exception Process of the CMP in every instance – thereby making "exceptions" the rule. SWBT's belated explanation of its frequent use of the exception process as a necessity due to "regulatory mandates" is simply contrary to the facts. In addition, SWBT has still not implemented "versioning" to support two EDI releases simultaneously. Finally, SWBT continues to fall short of its obligation to provide CLECs with the adequate documentation and test environment that they need to ensure that they will conduct transactions effectively using the OSS in the actual production environment.

6.   Second, as discussed in Part III, SWBT still fails to provide CLECs with integrated (or integratable) pre-ordering and ordering functionality that is at a level of parity with that experienced by SWBT's own retail operations. Notwithstanding SWBT's contention that

CLECs can integrate the DataGate pre-ordering interface with the EDI ordering interface simply by using its existing OSS documentation, CLECs cannot do so, because key elements of the pre-ordering information retrieved through DataGate are not formatted in a way that allows them to be automatically populated into EDI ordering fields. Telecordia's recent "supplemental report" on integration shows, if anything, that CLECs cannot successfully integrate pre-ordering and ordering functions. SWBT's assertion that the functionalities are currently integratable is belied by its promises to implement "programming enhancements" that will make it unnecessary for CLECs to "parse" address information, and to provide special assistance to CLECs in performing such integration. Even if the "programming enhancements" are implemented in late May as SWBT promises, they will not eliminate all of the problems associated with the current inability of CLECs to perform integration successfully.

7.   Third, as described in Part IV, SWBT's OSS are still characterized by high rates of order rejection and manual intervention. SWBT still rejects more than 30 percent of CLEC orders – an unacceptably high rate by any standard – and that rate will remain unacceptably high even if SWBT implements its proposed "programming enhancements." The difficulties experienced by CLECs as a result of SWBT's high overall rejection rate are compounded by the fact that, by SWBT's own admission, more than one-third of SWBT rejection notices are manually typed by a SWBT representative before they are sent to the CLECs – a process that carries with it an inherent risk of error and delay. Finally, SWBT has not shown that its flow-through rate for CLEC orders is at parity with the rate for SWBT's retail operations, particularly in view of the low flow-through rate for orders submitted via its LEX interface.

4

8.   Fourth, as discussed in Part V, SWBT's status notices and ordering

requirements still do not comply with SWBT's obligations to provide CLECs with parity of

access to its OSS. SWBT provides jeopardy notices on CLEC orders that have already been

confirmed, for problems in the order that should have been detected by SWBT's OSS before

issuance of a confirmation. SWBT is still not returning order confirmations and notices of order

completion to CLECs in a timely manner. Further, the discriminatory ordering requirements that

SWBT imposes on CLECs seeking to migrate SWBT customers with multiple lines to the CLEC

severely hamper the CLECs' ability to place orders for, and serve, such customers efficiently.

9.   Fifth, as discussed in Part VI, SWBT's OSS still have not been

demonstrated to be operationally ready. SWBT's own performance data demonstrate that its

performance in such key areas as provisioning accuracy is deteriorating as CLEC volumes are

increasing. CLECs continue to experience unacceptably high levels of complete service outages

(no dial tone or loss of incoming calls) and service degradation (*e.g.*, static or noise on the line)

in connection with UNE platform conversions, due in part to SWBT's "three-order" system and

in part to unexplained causes. In addition, SWBT has not shown that the capacity of its OSS is

sufficient to handle current and future CLEC volumes. In light of these facts, SWBT's claim of

compliance with its OSS obligations under the Section 271 checklist remains nothing more than

wishful thinking.

II.   SWBT STILL FAILS TO PROVIDE CLECs WITH THE TECHNICAL RESOURCES AND ASSISTANCE NECESSARY FOR PROPER IMPLEMENTATION AND MAINTENANCE OF ITS INTERFACES.

10.   SWBT's recent filing only confirms its continuing failure to meet its

obligation to "adequately assist[] competing carriers to understand how to implement and use all

of the OSS functions available to them."[3] SWBT still fails to provide critical assistance to the

CLECs in a number of areas:

- By SWBT's own admission, none of the releases that SWBT has implemented since last December 20 have complied with the normal time intervals of the change management process. Instead, SWBT has circumvented the process by using – and abusing – the "exception process" in the CMP to issue the releases on substantially shorter notice.

- By SWBT's own admission, SWBT has still not implemented EDI versioning capability, which would enable CLECs to avoid the potentially catastrophic consequences of an unsuccessful "flash cut" from one version of SWBT's OSS software to the next version. Although SWBT has promised to implement versioning on July 22, it is not clear at this stage that it will do so even by that date.

- SWBT continues to fail to provide adequate OSS documentation to CLECs.

- The test environment that SWBT provides to CLECs continues to fail to mirror the production environment.

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[3] *See Application of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New* York, CC Docket No. 99-295, Memorandum Opinion and Order released December 22, 1999 (*"Bell Atlantic New York Order"*), ¶ 87; *Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana,* CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998) (*"Second BellSouth Louisiana Order"*), ¶ 85; *Application of BellSouth Corporation, Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region InterLATA Services in South Carolina,* CC Docket No. 97-208, Memorandum Opinion and Order, 13 FCC Rcd 539 (1997) (*"BellSouth South Carolina Order"*), ¶ 96; *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region InterLATA Service in Michigan,* CC Docket No. 97-137, Memorandum Opinion and Order, 12 FCC Rcd 20543 (1997) (*"Ameritech Michigan Order"*), ¶ 136; Dalton DeYoung Initial Decl., ¶¶ 34-85.

A. SWBT Continues To Fail To Demonstrate Compliance With the Established Change Management Process.

11.   This Commission has stated that, in determining whether a Bell Operating

Company ("BOC") has met its OSS obligations, it "will give substantial consideration to the

existence of an adequate change management process *and evidence that the BOC has adhered to*

this process over time." Bell Atlantic New York Order, ¶ 102 (emphasis added). The evidence

previously submitted in response to SWBT's application showed that SWBT clearly had not

complied with the CMP which had been established in Texas, or otherwise provided the prior

notice required under any adequate change management process. *See* Dalton/DeYoung Initial

Decl., ¶¶ 37-73.

12.   SWBT's recent amendments to its application show that this pattern of

noncompliance with the CMP continues. By SWBT's own admission, *not one of the releases*

that SWBT has implemented since December has been issued in accordance with the regular

notice requirements of the CMP. Instead, SWBT has made the changes in these releases

pursuant to the Exception Process set forth in the CMP, giving advance notice shorter than that

normally required under the CMP. Ham Supp. Aff., ¶¶ 55, 57.

13.   SWBT nonetheless argues that these releases 'have been implemented in

compliance with the requirements of the agreed-upon change management process," because

"SWBT has followed the CMP guidelines for exception releases." *Id.*, ¶ 55. SWBT's assertion

is illogical, because compliance with the CMP cannot be demonstrated through consistent

circumvention of its regular notice requirements

14. The existing CMP includes an Exception Process that permits SWBT to make changes in non-emergency situations without complying with the agreed-upon regular notice requirements. However, the CMP's only substantive "guideline" governing exceptions is that they be made only "occasionally" – not constantly.[4] By making *every* change through the Exception Process, SWBT has effectively turned this principle on its head.

15. SWBT states that its use of the Exception Process was necessitated by: (1) "numerous regulatory mandates" issued at the end of 1999 and at the beginning of 2000 that required "massive and complex programming changes on SWBT's part"; and (2) "process improvements requested by CLECs." *Id.*, ¶¶ 55, 57. These rationales are specious.

16. First, contrary to the impression conveyed by SWBT, SWBT's use of the Exception Process this year is not a unique occurrence. SWBT has repeatedly used the Exception Process to make changes since the CMP was first established in 1998. Indeed, SWBT unilaterally declared that 1998 would be an "exceptions year" during which it would not follow the regular notice requirements of the CMP. SWBT took the same position, and followed the same course, in 1999. Although CLECs anticipated that in 2000 SWBT would finally end its reliance on the Exception Process and comply with the regular notice requirements, it clearly has not done so.

17. Second, SWBT's reliance on "regulatory mandates" and "CLEC requests" is misplaced. As shown in Attachment 1, neither justification was set forth in the majority of the

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[4] Section 6.2.1 of the CMP provides: "Above and beyond the need to handle emergency situations, the parties recognize the need to *occasionally* allow for other exceptions to the CMP described herein." *See* Ham Supp. Aff., Att. S (emphasis added).

thirteen "Exception" Accessible Letters that SWBT has issued. All too often, the letters offered

no explanation of the need for an exception. In fact, even SWBT's own summary of the letters

fails to mention regulatory mandates or CLEC requests as the reasons for many of the changes.[5]

18.   Even leaving these facts aside, SWBT cannot reasonably justify its

consistent use of the Exception Process to make changes on the basis of "regulatory mandates."

The various federal and state regulators are not requiring SWBT to implement changes with such

speed that it would be impossible for SWBT to make them without being freed of the regular

notice requirements of the CMP.

19.   On the other hand, in at least one instance where the TPUC *did* require

SWBT to make a change with a definite deadline, SWBT not only did not use the Exception

Process to meet the deadline, but ignored the deadline entirely. Despite the TPUC's order in July

1998 mandating that SWBT implement EDI versioning by January 15, 2000, SWBT still has not

done so.[6] SWBT now proposes that it will implement versioning in late July, but there is no

assurance that it will meet even that proposed date, as described below.

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[5] *See, e.g.,* Ham Supp. Aff., ¶ 57 & Atts. I, S-1 - S-3, S-9, S-10, S-12. SWBT's summary, for example, describes regulatory mandates as the "reason for change" for, at most, four of the thirteen of the Exception Accessible Letters that it cites. For the remaining letters, the "reason for change" suggests neither a regulatory mandate nor a CLEC request. Indeed, SWBT describes at least three of the Letters as changes requested by SWBT itself. *Id.*, ¶ 57 (reasons include "additions to final requirements," "N/A," "SWBT is requesting changes," "SWBT requesting approval of changes," "SWBT clarification/changes to Requirements," and "SWBT notification that release will be implemented as planned")

[6] *See* Dalton/DeYoung Initial Decl., ¶ 41; TPUC Docket No. 19000, Order No. 5 (July 23, 1998) (Dalton/DeYoung Initial Decl., Att. 2).

20.   SWBT's alternative reason for its use of the Exception Process – "process improvements requested by CLECs" – is similarly baseless, because exceptions to the CMP are generally contrary to the CLECs' interests. Although many of the changes made by SWBT were certainly welcomed by CLECs (given the deficiencies in SWBT's OSS), SWBT does not claim that CLECs requested it to make them through the Exception Process. Exceptions to the process create instability, increase the CLECs' costs of operation, and enhance the likelihood of errors, regardless of whether the changes involved are major or minor. The provisions of the CMP plainly reflect the desire of CLECs that such disruptions be avoided. The CMP provides that changes be implemented by SWBT in accordance with the regular notice requirements, and apply to any changes irrespective of whether they were requested by SWBT or the CLECs – with use of the Exception Process being a rarity, not the rule.

21.   In short, a CLEC request for a particular change cannot reasonably be construed as agreement to implement that change within time frames far shorter than those mandated under normal CMP procedures. Attachment 1 hereto describes the dates of the 13 "Release" Accessible Letters that SWBT has issued since December 20, together with the release date or effective date of the changes announced in each letter. The advance notice provided by each letter was considerably shorter than the 120-day regular interval required by the CMP, with some intervals as short as 16 or 26 days. For example, SWBT issued Accessible Letter No. CLECSS99-175, announcing the addition of manual rejection and jeopardy codes, on December

30 – only 16 days prior to the scheduled January 15 release date. *See* Attachment 1; Ham Supp. Aff., ¶ 57 & Att. S-2.[7]

22.   Moreover, SWBT's use of the Exception Process to date is inconsistent with its professed reliance on "CLEC requests." In contrast to its persistent use of the Exception Process to implement the changes that it sought, SWBT has frequently advised CLECs that it could implement changes which they requested only through the regular notification procedures of the CMP. For example, when CLECs requested implementation of a fully automated process for the return of rejection notices, SWBT responded that such a request could be implemented only through the normal intervals of the CMP – and would take time. By contrast, when SWBT implemented its LASR GUI system, which required manual intervention for the return of rejection notices (and which the CLECs had not requested), SWBT invoked the Exception Process.

23.   Thus, SWBT's citation of "regulatory mandates" and "CLEC requests" is only a pretext. It is obvious that SWBT has used – and abused – the Exception Process in the hope that quick implementation of the releases will improve its prospects for approval of its Section 271 application. Rushed implementations, however, create instability – at the CLECs' expense.

24.   As if to compensate for its use of the Exception Process for all of its releases, SWBT states that it has "followed other requirements of the CMP," including

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[7] In Accessible Letter No. CLECSS99-164, issued November 30, 1999 – which SWBT does not mention (*see* Ham Supp. Aff., ¶ 57) – SWBT provided the final requirements for its January 2000 release for the management of LIDB data via the LSR process only 48 days prior to the January 17 implementation date.

publication of minutes to its CMP meetings within two weeks of the meeting, forwarding draft

minutes to CLECs for review, and reviewing "action" items at CMP meetings. Ham Supp. Aff.,

¶ 56. Although CLECs certainly need compliance by SWBT in these areas, from a change

management standpoint the CLECs' greatest need is stability of OSS development and stability

to CLEC production systems and processes. Those goals can be achieved only if SWBT creates

and distributes release requirements within the normal CMP intervals – not through the

Exception Process.

25.   SWBT also suggests that, given the requirement of the CMP that

deviations from the normal CMP be unanimous, the CLECs agreed to its use of the Exception

Process. *Id.*, ¶ 58. SWBT is incorrect. As SWBT concedes, the unanimity requirement is not

applicable to regulatory-mandated changes that must be implemented within a specified time

frame. *Id.*, ¶ 58 & Att. S (CMP, ¶ 6.2.4). Thus, to the extent that the releases involved such

regulatory mandates (as SWBT asserts), CLECs had no ability to raise objections.

26.   More importantly, the lack of CLEC objections simply reflects the fact

that CLECs are anxious to avoid delaying indefinitely the systems improvements that the

releases provide. For example, AT&T and other CLECs have repeatedly objected to SWBT's

general practice of using the Exception Process as its method of implementing changes.

However, AT&T has not objected to specific changes made under the Exception Process, either

because AT&T was not impacted by the changes or because AT&T was concerned that an

objection would delay indefinitely the implementation of functionality that would be useful to

AT&T. Indeed, once SWBT filed its application with this Commission, SWBT might never

implement a proposed change if a CLEC objected thereafter to the use of the Exception Process,

because SWBT will have far less incentive to make improvements in its OSS for the CLECs

should its application be approved.

27.   SWBT's use of the Exception Process has had a disruptive effect not only

on CLEC operations, but on the accuracy of the OSS documentation on which CLECs must rely.

That documentation is adequate only if it is kept up-to-date to reflect the changes that SWBT is

making in its systems. In view of the number and frequency of the changes that it has made

within the last few months, SWBT has been unable to maintain documentation that fully and

accurately reflects those changes. At a Change Management meeting held on April 5, 2000,

SWBT acknowledged that it had made mistakes in its release documentation, which it attributed

in part to the "rapidly changing requirements that impact documentation."[8]

28.   SWBT's noncompliance with the CMP goes beyond its misuse of the

Exception Process. As detailed in the initial OSS declaration filed in this proceeding, SWBT has

demonstrated a consistent pattern of non-compliance with change management procedures on its

announced releases, as demonstrated by its implementation of each of the releases introduced

over the last year (*see* Dalton/DeYoung Initial Decl., ¶¶ 54-73) and by the fact that it has made

changes outside the change management process altogether. *Id.*, ¶¶ 45-53. For example, in the

summer of 1999, SWBT erroneously rejected AT&T orders for toll blocking with customized

routing on the basis of unannounced software changes. *Id.*, ¶ 46. Similarly, SWBT's

unannounced change to rate class coding on certain billing records caused AT&T to erroneously

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[8] *See* "Final Minutes for April 5, 2000 Charge Management Process Meeting – Arkansas,
Kansas, Missouri, Oklahoma, Texas," set forth in SWBT Accessible Letter No. CLEC00-093,
dated April 19, 2000, p. 4 ("April 5 Minutes") (Attachment 2 hereto).

bill its end-user customers for an operator handling surcharge on direct dial calls. *See id.*, ¶¶ 48-50.

29.   Moreover, SWBT's pattern of making unannounced changes that affect CLEC billing has continued. For example, SWBT is required to file tariffs whenever it makes changes in its "calling scopes" – the geographic boundaries used to determine whether a particular call will be classified as a local call or a long-distance call. CLECs rely on those tariffs to determine their own calling scopes and the charges that they should bill to their customers. If the CLEC does not use the current, correct calling scope, a call that appears to be local may in fact be long-distance (or vice versa) – and billings to end-users will be erroneous.

30.   SWBT, however, has frequently changed calling scopes, without notice to CLECs, before it files tariffs implementing the change. Some of these changes were made several months before the applicable tariffs were filed. Given the need of CLECs to bill customers correctly, this practice has put CLECs at a distinct competitive disadvantage.

31.   In response to repeated protests by AT&T, in early April 2000 SWBT finally agreed that it would send an Accessible Letter providing notification prior to making any change in a particular calling scope, and issued the first such Accessible Letter on April 3, 2000. However, SWBT has not committed to issue such letters on a regular basis by a specified date in advance of the filing of the applicable tariff change Nor has it responded to AT&T's request that it provide the specific details (such as NPA-NXXs) that CLECs need to ensure that their tables are the same as SWBT's for purposes of the message rating process. Until these issues have been resolved, it would be premature to conclude that SWBT's failure to provide appropriate advance notice of calling scope changes has been corrected.

14

B.   SWBT Has Still Not Implemented Versioning.

32.   SWBT has yet to implement "versioning" – the practice of simultaneously supporting two or more releases of a given software package. *See* Dalton/DeYoung Initial Decl., ¶¶ 37-44. In its latest submission, SWBT simply states that it "has committed to support versioning in EDI," and indicates that it will implement versioning on July 22, 2000. Ham Supp. Aff., ¶¶ 61-62.

33.   SWBT's promise of future implementation is no substitute for current performance, as this Commission has previously recognized. *Ameritech Michigan Order*, ¶¶ 55, 179. Moreover, as SWBT concedes, at the time of its latest filing it had not even distributed the initial requirements for the July 22nd release, including versioning requirements. Ham Supp. Aff., ¶ 62.

34.   SWBT suggests that its failure to implement versioning to date is defensible because of the lack of OBF industry standards. *Id.*, ¶ 61. That is incorrect, as evidenced by the fact that other BOCs, including Bell Atlantic, have already implemented versioning. *See* Dalton/DeYoung Initial Decl., ¶ 44.[9] Furthermore, irrespective of whether industry standards exist, parity of access cannot be said to exist as long as CLECs remain subject to a "flash cut implementation" approach that SWBT – due to its total control over the timing and content of the changes that it makes – does not experience in its retail operations.

35.   Finally, it is unclear whether SWBT will implement versioning on July 22, as scheduled. On April 6 – only one day after the filing of its latest submission – SWBT

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[9] The FCC, in fact, commended Bell Atlantic for implementing versioning in its decision approving Bell Atlantic's Section 271 application. *Bell Atlantic New York Order*, ¶ 110.

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distributed Accessible Letter No. CLECCSS00-057, which set forth the Initial Requirements for

the July 22 release. In the letter itself, SWBT states that "the final release date and requirements

will be communicated in a subsequent Final Notification letter."[10] Thus, it will be some time

before the actual implementation date of versioning will be known.

C.   SWBT Continues To Fail To Publish Adequate OSS Documentation.

36.   As AT&T previously demonstrated, SWBT has failed to fulfill its

obligation to provide accurate, specific interface documentation to CLECs. Most notably, in

contrast to Bell Atlantic and other BOCs, SWBT does not publish customized EDI specifications

that reflect the deviations between its EDI interface development and industry standards. *See*

Dalton/DeYoung Decl., ¶¶ 81-85.

37.   SWBT now maintains that "there is no need to publish extensive

proprietary EDI and CORBA documentation, as was the case for Bell Atlantic," because it

"follows industry standards so closely." Ham Supp. Aff., ¶ 7; *see also id.*, ¶ 67. SWBT,

however, supplies no evidence to support its suggestion that the extent of Bell Atlantic's

departure from industry standards is greater than its own.

38.   In any event, SWBT's contention that it "follows industry standards so

closely" is flatly wrong, as AT&T's experience and SWBT's own practices demonstrate.

Because SWBT had published no customized EDI documentation, and because industry

standards are not binding on the BOCs, AT&T was required to develop its side of the EDI

interface through a lengthy, expensive trial-and-error process. Dalton/DeYoung Initial Decl., ¶

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[10] A copy of the April 6 Accessible Letter (without attachments) is attached hereto as Attachment
3.

82. Moreover, if SWBT followed industry standards "so closely," there would have been no need for SWBT to publish a series of Accessible Letters on its Website that describe some of the differences between industry standard EDI interface specifications and those peculiar to SWBT. *Id.*, ¶ 83. Even those Accessible Letters do not capture all of the deviations, however. For example, in October 1999, at AT&T's request, General Electric Global Exchange Services (then known as General Electric Information Systems) reviewed the Accessible Letters and determined that they did not describe SWBT's deviations from industry standards relating to order status notices (such as firm order confirmations, service order completion notices, and rejection notices). *Id.*[11]

39.   In addition to its failure to publish customized EDI documentation, SWBT's published documentation is inconsistent with its EDI ordering requirements. For example, SWBT's Local Service Ordering Requirements ("LSOR") indicate that on a Request Type C (a change order), a Customer Carrier Name Abbreviation ("CCNA") is not required. However, EDI standard 3072 requires that a CLEC must include a CCNA in a LSR for an N1-02 loop if an Actual Location, First Point of Termination, or Implementation Contact is specified on the LSR.

40.   At a documentation meeting held by SBC with CLECs on April 11, 2000, AT&T cited discrepancies between the LSOR and the EDI requirements. AT&T requested that

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[11] SWBT states that "If there are perceived shortcomings of the [industry standard] documentation, . . . those would be addressed through the standards process in which the CLECs participate." Ham Supp. Aff., ¶ 7. SWBT's argument is a red herring. AT&T's criticism of the SWBT documentation is not directed at industry standards, or the industry standard

(Continued . . .)

SWBT provide EDI information with each field in the LSOR and/or make specific reference to

documents that are outside of the LSOR that change, modify, or make conditional the LSOR

rules for EDI. SWBT, however, has not done so.

41.   Furthermore, the various release documentation issued by SWBT is

replete with ambiguities, errors, and inconsistencies. The documentation is sometimes unclear

and subject to varying interpretations. It also contains numerous errors, as SWBT has admitted.

At a change management proceeding on April 5, 2000, SWBT acknowledged that "mistakes

were made" in its releases, and that it would work to improve the interface release process.[12]

42.   Finally, SWBT's documentation suffers from deficiencies that make it

confusing and difficult for CLECs to use. For example:

- SWBT does not adequately cross-reference its ordering rules. For certain
  products, a CLEC must know not only the requirements of the LSOR, but also
  certain conditions and clarifications set forth in other SWBT documentation,
  in order to place the order successfully. The LSOR, however, currently
  contains few references to other documents that set forth these conditions and
  clarifications. This lack of cross-referencing increases the likelihood of order
  rejections.[13] Although a CLEC could theoretically search every one of

(Continued . . .)
documentation. Rather, AT&T is challenging SWBT's failure to publish documentation that
fully describes the extent to which SWBT *departs* from those standards.

[12] *See* April 5 Minutes, p. 4 (Attachment 2 hereto). SWBT explained that these mistakes were
due to the "enormous amount of work" associated with meeting regulatory requirements
concerning line sharing, and to the "rapidly changing requirements that impact documentation."
Id. As previously stated, SWBT's explanations are not a valid basis for either its total departure
from normal change management procedures or its inadequate documentation.

[13] An example of the type of cross-referencing that SWBT should perform on a regular basis, but
currently performs infrequently, is an Accessible Letter dated November 3, 1999 (Attachment 4
hereto), which provides cross-references to the LSOR in the CLEC Handbook (and vice versa) to
reflect updates in the Handbook.

FCC DOCKET CC NO. 00-65
SUPPLEMENTAL DECLARATION
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SWBT's OSS documents to determine whether any special conditions or clarifications exist for a particular type of order, such a procedure would be time-consuming and burdensome, particularly since many of these documents are on a different link in SWBT's Website, or on a different Website altogether, than the LSOR.[14]

- When SWBT issues new editions of the LSOR and other documentation, it does not supply a list of those pages that have been changed. Instead, the CLEC must make a page-by-page comparison to identify the changes. Because the LSOR is hundreds of pages in length, this process requires the dedication of substantial time and resources.

- SWBT does not keep the CLEC Handbook up-to-date with its various document releases. Nor does SWBT notify CLECs of all updates in the CLEC Handbook when it makes them.

D. SWBT Still Fails To Provide an Adequate Test Environment.

43. SWBT still fails to fulfill its obligation to provide CLECs with a testing environment that mirrors the production environment. *See* Dalton/DeYoung Initial Decl., ¶¶ 74-80. Unlike its production environment, where at least some orders are programmed to flow through to SWBT's SORD system for order distribution, orders in the test environment do not flow through – but are instead hand-carried through the system. Furthermore, status notices are not fully automated. This deficiency denies CLECs the opportunity to determine the extent of flow-through capability and automated status notification, and the impact of new releases and other changes, in the production environment. *Id.*, ¶ 77.

44. The artificial conditions employed by SWBT in the test environment also create the possibility that problems will not be detected until actual production begins. That has

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[14] For example, on SWBT's Website, CLECs must access EDI exceptions through the IS Call Center Link, and Accessible Letters on the Accessible Letter Link, whereas EDI standards are on a totally different Website.

happened in the past when SWBT rejected test orders from AT&T because it had failed to

implement in the test environment changes that it had made to the production environment.

Dalton/DeYoung Initial Decl., ¶ 76. More recently, in testing SWBT's January 2000 "LIDB I"

release, two serious problems arose when CLECs attempted to move out of the test environment

and into the production environment because of the severe limitations and inadequacies of

SWBT's test environment. Both of these problems arose because of the failure of SWBT's test

environment to "mirror" its production environment. *See Bell Atlantic New York Order,* ¶ 109.

Specifically, as SWBT has conceded, "some orders after implementation failed to process

correctly" when the CLEC moved from the test environment into production because certain

tables that had been updated in SWBT's testing environment had not been updated on a timely

basis in SWBT's production environment.[15] In addition, because SWBT's test environment does

not take orders through the posting cycle in billing, but only through service order creation,

SWBT's test environment failed to detect a posting problem that only came to light when the

CLEC moved into production.[16]

45.   Furthermore, SWBT has not developed a standard baseline validation test

deck – *i.e.*, a compilation of transactions designed to test whether a new release produces

expected results. CLECs cannot assume that test accounts that they used in previous joint testing

with SWBT will be available when SWBT issues a new release. Instead, with each new release,

CLECs must contact SWBT to determine whether particular previously-used accounts are

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[15] *See* Accessible Letter No. CLEC00-043, Minutes for 2/8/00 Change Management Meeting,
pp. 5-6 (Attachment D to AT&T March 8, 2000 Ex Parte letter to the Commission).

[16] *See* AT&T March 8, 2000 Ex Parte letter to the Commission, pp. 9-10.

available for the new testing. SWBT's lack of a standard test deck is in marked contrast to Bell

Atlantic, whose maintenance of a baseline validation test deck was one of the reasons cited by

the FCC for its conclusion that Bell Atlantic's test environment was adequate. *Bell Atlantic New*

York Order, ¶¶ 110 & n.305, 111, 119-122 & n.342.

46.   Despite these obvious deficiencies in its test environment, SWBT has

made no plans or commitments to correct them, even after AT&T's requests that it do so. In

fact, at an April 5 Change Management Process Meeting, SWBT stated that although it would

review its internal testing process, it was "not in a position with all the other projects committed

for this year to totally revamp the test system at this time."[17]

47.   Although SWBT introduced last November a test environment which, it

asserted, has enhanced capabilities, the adequacy of that environment has yet to be demonstrated.

Id., ¶¶ 79-80. Telcordia has no plan to exercise or "test" SWBT's test environment, despite

SWBT's previous assurances that Telcordia would validate the test environment. *Id.*, ¶ 78 &

n.55. Telcordia reaffirmed this fact during an April 19, 2000 conference call with the TPUC

staff, SWBT, AT&T and other CLECs. Telcordia stated that it had assumed that the test

environment was meeting its stated objectives because no CLEC had invoked the "go/no go"

dispute resolution procedures of the CMP in connection with any release since installation of the

purportedly enhanced test environment. Telcordia further stated that it will not be reviewing the

internal testing processes employed by SWBT in advance of CLEC testing.[18]

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[17] *See* April 5 Minutes, p. 3 (Attachment 2 hereto).

[18] Because SWBT's test environment does not mirror the actual production environment, earlier
this month AT&T requested SWBT to agree to conduct joint testing of approximately 30 lines to